

UNITED STATES BANKRUPTCY COURT
DISTRICT OF NEW HAMPSHIRE

IN RE: * Case No. 22-10461-BAH
* Chapter 13
Michael A. Guglielmo * Adv. 23-01001-BAH
Debtor *

Christina Snarski *
*
* Plaintiff *
*
* v. *
* Michael A. Guglielmo *
* Defendant *

DEBTOR'S ASSENTED TO MOTION TO CONTINUE PRETRIAL
CONFERENCE SCHEDULED FOR DECEMBER 20, 2023 AT 1:30
P.M.

NOW COMES Michael Guglielmo, the Debtor in this case, by and through his attorney, Sandra A. Kuhn, Esq. of Family Legal Services, P.C., and files this request that the Court continue the PRETRIAL CONFERENCE scheduled for December 20, 2023 at 1:30 p.m. In support of this Motion, the Debtor states as follows:

1. The Debtor filed for Chapter 13 bankruptcy protection on September 21, 2022.
2. On or about November 30, 2022, Christine Snarski filed a claim in the amount of \$369,000.00 indicating that her claim was secured by a lien upon the Debtor's real estate indicating she has a recorded mortgage owed to FNMA. She further indicated that the arrears necessary to cure the claim was \$91,895.69.
3. The Debtor filed an objection to claim 16 on or about April 2, 2023.

4. The hearing on the objection to claim is presently scheduled for December 20, 2023 at 1:30 p.m. The parties have asked that hearing be moved to February 21, 2024 at 1:30 p.m.
5. Counsel for the parties have been in communication relative to seeking to resolve both the objection to claim and the adversary issue.
6. The parties had previously both procured a broker to sell the Northfield New Hampshire property at issue between the parties and the Court has already approved the retention of the broker as well as the sale of the real estate. The closing on the real estate unfortunately did not occur.
7. The Debtor has modified his plan to pay the arrears on the Northfield property mortgage. The parties are now working to see if the Debtor can assume the mortgage on the Northfield property and they have been in contact with the lender's counsel.
8. **Resolution of the objection to claim and the adversary proceeding will likely occur if the Debtor can assume the mortgage on the Northfield property and also provide for the arrears in his plan.**
9. The parties are presently still working together for their common objective and counsel do not want that situation to fall apart by causing angst between them in arguing the objection to claim or having a hearing in the adversary proceeding at his time. The parties have a long history together. It is a fragile situation and counsel are working together to keep the situation from falling apart.
10. Additionally the Debtor's very young daughter was hospitalized last night for a serious respiratory illness and he has advised that he is at the hospital with her and unable to attend any hearings today.
11. Given the above, the parties agree that the pretrial conference should be continued from December 20, 2023 at 1:30 p.m to February 21, 2024 at 1:30 p.m..

WHEREFORE, Debtor prays that this Court:

- A. CONTINUE the pretrial conference scheduled for December 20, 2023 at 1:30 p.m. to February 21, 2024 at 1:30 p.m.;
AND
- B. GRANT such other relief as is just and necessary.

Respectfully Submitted,
Mr. Guglielmo
By His Attorney
FAMILYLEGAL

12/20/2023
Date

/s/Sandra A. Kuhn
Sandra A. Kuhn, Esq.
BNH 03832
141 Airport Road
Concord, NH 03301

CERTIFICATE OF SERVICE

I hereby certify that a true copy of this MOTION ALONG WITH THE PROPOSED ORDER was sent this 20th day of December 2023 to the following parties:

Chapter 13 Trustee
(By ECF)

US Trustee
(By ECF)

Attorney McKenzie
(by ECF)

Date: 12/20/2023

/S/ Sandra Kuhn, Esq.
Sandra Kuhn, Esq.